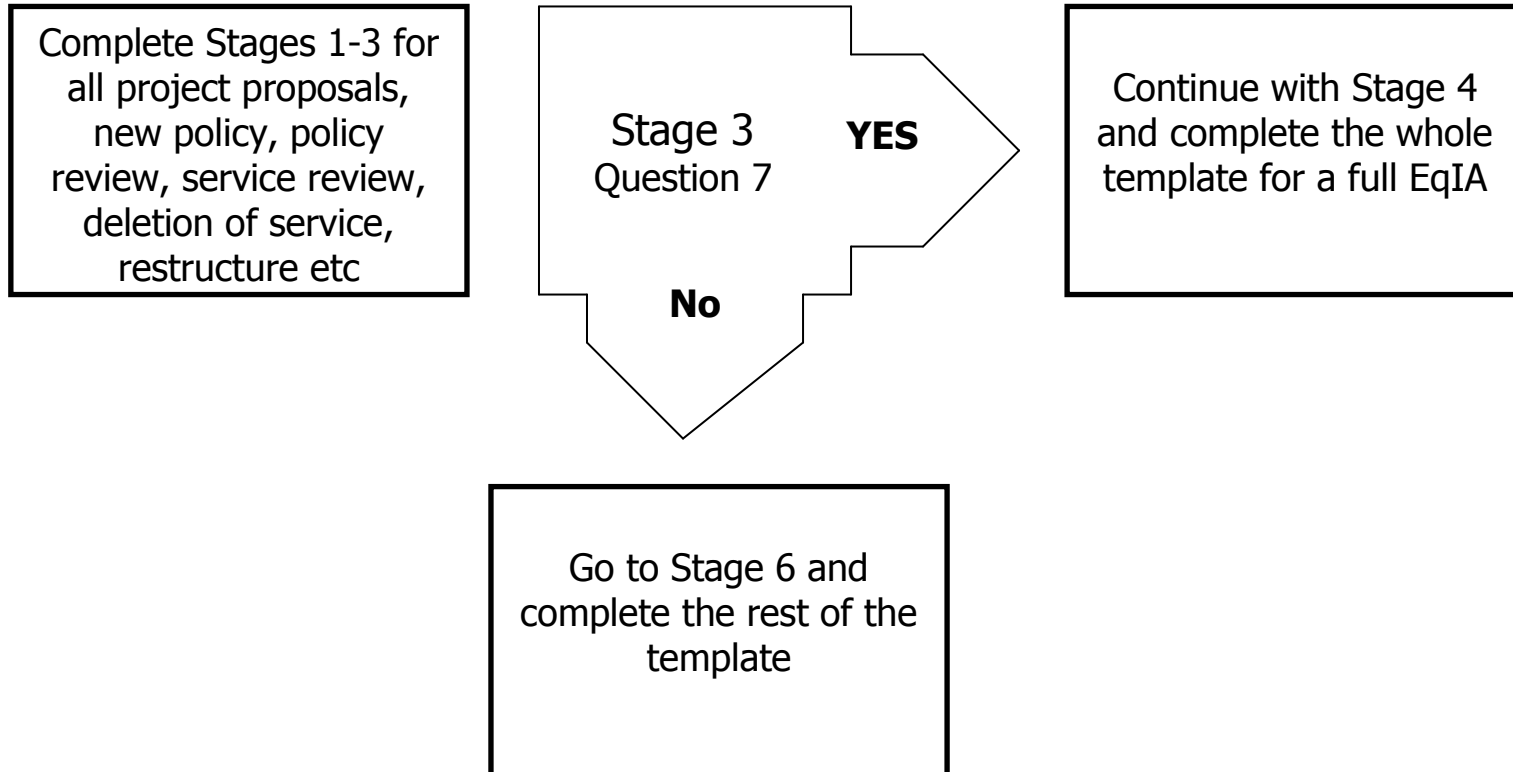


# Equality Impact Assessment Template

The Council has revised and simplified its Equality Impact Assessment process. There is now just one Template. Project Managers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.



## Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:		Tick ✓	Type of Decision:		Tick ✓
Transformation			Cabinet		✓
Capital			Portfolio Holder		
Service Plan			Corporate Strategic Board		
Other	Implementing school expansion programme	✓	Other		
Title of Project:		Permanent expansion of the following community school: Longfield Primary School Dukes Avenue North Harrow, HA2 7NZ  At its meeting on 23 April 2015, Harrow Cabinet is recommended to approve the statutory proposals to expand permanently the school by one form of entry (30 pupils), which will fill incrementally from the point of admission into the school.			
Directorate / Service responsible:		Children & Families			
Name and job title of lead officer:		Johanna Morgan, Education Lead School Organisation			
Name & contact details of the other persons involved in the assessment:		Chris Melly, Senior Professional, School Organisation Pam Virdee, Headteacher of Longfield Primary School			
Date of assessment:		20 February 2015			
<b>Stage 1: Overview</b>					
<b>1. What are you trying to do?</b>  (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal)		It is proposed to permanently expand Longfield Primary School from 1 September 2015 to become a four form of entry school (120 places) from its current three forms of entry (90 places).  Education school expansion statutory processes are being undertaken. On 13			

of service, restructure, deletion of posts etc)

February 2015, the Corporate Director of Children and Families, under delegated authority and following consultation with the Portfolio Holder for Children, Schools and Young People, considered the outcome of the consultation about the proposed expansion and decided to publish statutory proposals to effect the expansion. The statutory proposals were published from 23 February to 23 March 2015.

One representation in relation to the statutory proposals was received by Harrow Council by the closing date of the representation period on 23 March 2015. This representation and officer comment will be reported to Harrow Cabinet when determining the statutory proposals on 23 April 2015.

The permanent expansion of Longfield Primary School is proposed as part of the Primary School Expansion Programme within Harrow Council's School Place Planning Strategy. Cabinet agreed its School Place Planning Strategy in February 2010 to meet the increasing demand for school places that is primarily birth rate driven. In July 2011, Cabinet agreed on a Primary School Expansion Programme as part of the School Place Planning Strategy. The strategy aims to secure sufficient primary school places through the creation of additional permanent places, supplemented by planned bulge classes and contingency bulge classes, opened if required.

<b>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</b>	Residents / Service Users	✓	Partners / Schools	✓	Stakeholders	✓
	Staff	✓	Age	✓	Disability	✓
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity	
	Race		Religion or Belief		Sex	
	Sexual Orientation		Other			

**3. Is the responsibility shared with another directorate, authority or organisation? If so:**

- Who are the partners?
- Who has the overall responsibility?
- How have they been involved in the assessment?

There is a statutory responsibility on the local authority to ensure sufficient school places in its area. Children & Families is the lead directorate, though the school expansion programme has to be delivered corporately with the involvement of officers from other directorates e.g. Environment and Enterprise, Finance, Performance, Legal.

The school expansion programme is delivered in partnership between the local authority and schools.

## Stage 2: Evidence / Data Collation

4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

The Greater London Authority (GLA) prepares the pupil projections for Harrow Council. The GLA uses a range of information and data to prepare the projections including the number of births, number of pupils in Harrow schools, migration to Harrow and new housing development. Across London the population is growing, and the main reason for this is increasing birth rate. The demand for Reception class places (for pupils reaching 5 years of age) in Harrow schools is increasing:

- In January 2006 there were 2,224 Reception aged pupils in Harrow schools;
- In January 2013 there were 2,879 Reception aged pupils in Harrow schools;
- In January 2014 there were 3,030 Reception aged pupils in Harrow schools;
- In January 2016 it is projected there will be 3,463 Reception aged pupils in Harrow schools.

In September 2012 there were a total of 2,550 permanent Reception class places in Harrow's primary sector schools. To ensure sufficient school places to meet the increased demand, temporary additional Reception classes have been opened since 2009. In order to meet the actual and predicted increased demand in the next few years there is a need to increase the number of permanent school places, in the primary sector initially and in the secondary sector in due course. Additional places are also required to meet increased demand for provision to meet special educational need. Phase 1 of the primary school expansion programme was implemented in September 2013 with 8 schools in the borough permanently increasing their Reception intakes. In September 2015, when all the Phase 2 schools are expanded, there will be 3,240 permanent Reception places. In order to ensure sufficient school places to meet the predicted increased demand by September 2016, Harrow needs to increase the number of permanent Reception places by at least a further 300 places to a total of 3,540. The Phase 3 proposals, that include Longfield Primary School, aim to ensure sufficient school places at the right time and in the right location to meet the increased demand up to 2016/17. Full information about the projected demand for school places and the planning to increase school places across Harrow can be viewed in the 17 July 2014 Cabinet papers (item 21 School Expansion Programme Appendix B) at

Age (including carers of young/older people)

	<p><a href="http://www.harrow.gov.uk/www2/ieListDocuments.aspx?CId=249&amp;MId=62354&amp;Ver=4">http://www.harrow.gov.uk/www2/ieListDocuments.aspx?CId=249&amp;MId=62354&amp;Ver=4</a></p> <p>See Appendix A of this EqIA for data about the profile of pupils attending the school.</p>
Disability (including carers of disabled people)	<p>Longfield Primary School does not have lift access to the first floor and there are changes of level on the first floor. This was discussed with the Architect during site scoping work and provision for a lift has been included in site scoping design options for consideration as to whether any access issues could be addressed as part of the building works if the expansion proceeds. The school makes mainstream provision and does not have additionally resourced provision for pupils with special educational needs. Currently, any accessibility issues would be dealt with by the school under a management principle of meeting needs at a ground floor level should there be access issues.</p> <p>An increase in children of school age can be expected to include increased numbers of children with disability and special educational needs. The total number of statements of special educational need in Harrow has increased by 93 (or 9%) between 2006 and 2011 calendar years. In addition, the percentage of children with a statement placed in a special school (Harrow, other local authority, independent or non-maintained) has increased from 35% to 43% during the same period. This represents continued pressure and demand for more special school places. On 18 July 2013, Harrow Cabinet approved the Special School SEN Placements Planning Framework for bringing forward proposals over the next 3-5 years to increase provision for children and young people with special educational needs. Following successful applications in accordance with this framework to the Government's Targeted Basic Need Programme, 151 additional new SEN school places will be provided from 2015.</p> <p>See Appendix A of this EqIA for data about the profile of pupils attending the school.</p> <p>See Appendix B of this EqIA for the profile of respondents to the statutory consultation.</p> <p>Consultations about expansion proposals at schools in the School Expansion Programme have identified concerns from residents about emergency services being unable to respond to urgent resident needs during school drop off and collection times. This is recognised as a potential issue and traffic mitigation measures, and the school travel plan work to reduce car use, will reduce the risk of this eventuality arising.</p>
Gender Reassignment	Not applicable in the context of the expansion of this school.
Marriage / Civil Partnership	Not applicable in the context of the expansion of this school.
Pregnancy and Maternity	Not applicable in the context of the expansion of this school.
Race	<p>This is a community school which draws pupils from its local area and the pupil profile reflects the ethnicity of its area. The Provisional October 2014 School Census data demonstrates that the school has an ethnically diverse pupil population. See Appendix A of this EqIA for data about the profile of pupils attending the school.</p> <p>See Appendix B of this EqIA for the profile of respondents to the statutory consultation.</p>

	See Appendix C of this EqIA for the ethnic groups in the main wards from which children attend the school.
Religion and Belief	This is a community school which draws pupils from its local area and the pupil profile reflects the religions and beliefs of its area. See Appendix B of this EqIA for the profile of respondents to the statutory consultation.
Sex / Gender	This is a community school which draws pupils from its local area and the pupil profile reflects the gender of its area. See Appendix A of this EqIA for data about the profile of pupils attending the school.
Sexual Orientation	Not applicable in the context of the expansion of this school.
Socio Economic	Not applicable in the context of the expansion of this school.

**5. What consultation have you undertaken on your proposals?**

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
Statutory consultation was held with the school, its community of parents, staff and governors, local residents and interested parties about the expansion proposal between Thursday 8 January to Thursday 5 February 2015.	Consultation information was widely distributed including to neighbouring Local Authorities, local MPs, Councillors, Union representatives, Diocesan Bodies, voluntary organisations, and Harrow Youth Parliament. Information was put on the Harrow Council website, together with a facility for online response to the consultation. The	<p>Consultation about the proposal to expand Longfield Primary School was held between Thursday 8 January and Thursday 5 February 2015.</p> <p>Officers attended open consultation meetings for parents and for staff (on 13 January 2015) and for residents (on 20 January 2015) at the school about the expansion proposal to give a presentation and answer questions.</p> <p><b>Consultation responses</b></p> <p>24 responses were received to the consultation via the Harrow Council website 'Your Say' consultation portal and completed response forms. Respondents were primarily parents/carers and residents. Responses from organisations are set out below under 'Other responses to the consultation'. A number of comments were included with the responses and the four main themes are summarised below together with officer response to the themes.</p> <p>Two questions were asked in the consultation. They were:</p> <ul style="list-style-type: none"> <li>• "Do you agree with the approach to creating additional school places in Harrow?"</li> <li>• "Do you agree with the proposal to permanently expand Longfield Primary School?"</li> </ul>	<p>On 13 February 2015, the Corporate Director of Children and Families, under delegated authority and following consultation with the Portfolio Holder for Children, Schools and Young People, considered the outcome of the consultation about the proposed expansion and decided to publish statutory proposals to effect the expansion.</p> <p>Additional resource has been committed to ensure an appropriate profile to all the school expansion projects in particular.</p> <ul style="list-style-type: none"> <li>• Transport Assessments are being undertaken at each of</li> </ul>

Council distributed a letter to local residents to inform them of the consultation and to invite them to the consultation meeting at the school. The school distributed information and response forms to its parents, staff and governors and arranged open consultation meetings for parents and residents to enable discussion about the proposal.

Both questions offered the option to respond 'Yes', 'No', or 'Not Sure' to each question. Opportunity was given for comments to be added after each question if the respondent wished to do so. The following tables provide overall responses to the consultation questions.

The overall responses to Question 1 were:

**Question 1: "Do you agree with the approach to creating additional school places in Harrow?"**

Response	Number	Percentage
Yes	14	58.33%
No	7	29.17%
Not Sure	2	8.33%
Blank	1	4.17%
<b>Total</b>	<b>24</b>	<b>100.00%</b>

The overall responses to Question 2 were:

**Question 2: "Do you agree with the proposal to permanently expand Longfield Primary School?"**

Response	Number	Percentage
Yes	8	33.33%
No	11	45.83%
Not Sure	4	16.67%
No Response	1	4.17%
<b>Total</b>	<b>24</b>	<b>100.00%</b>

**Analysis of comments received**

The responses made to the first consultation question indicate agreement (58%) with the Council's approach to creating additional school places in Harrow with only 30% of respondents disagreeing with the approach.

Just under half (46%) of the respondents to the second consultation question disagree with the Council's proposal to expand Longfield Primary School. Half the parent/carer respondents (3 out of 6) disagree with the expansion of the school. Resident responses were even (6 agree and 6 disagree with the expansion of the school).

the schools proposed for expansion. The assessments provide an independent view of the proposals by reviewing baseline information about current traffic volumes and current issues and make recommendations about any impact as well as setting out any actions required. The assessments take account of the consultation responses already received.

- A Transport and Travel Planner Officer works with schools proposed for expansion to develop and implement effective travel strategies in conjunction with the schools. This is a key role in influencing and engaging with all stakeholders to change attitudes to travel through the review and the development of School Travel Plans in order to minimise the use of private car travel to the school, particularly by parents. This role also liaises with the Highways, Traffic Management and Enforcement teams to ensure that any necessary engineering work and enforcement action is provided in line with the travel plans developed. This officer is also involved in the pre-planning engagement activities that input into the planning applications.
- The Transport Assessment

The low response level of 24 needs to be viewed in the context of some hundreds of response forms distributed to parents and staff by the school and 570 letters delivered by the Council to local residents. Also the publicising of the online consultation response portal on the Harrow Council website.

**Other responses to the consultation**

Governing Body

The formal response by the Governing Body of Longfield Primary School to the statutory consultation:

- supports the approach to creating additional school places in Harrow;
- supports publication of statutory proposals to expand the school to four form entry from September 2015.

However, the governors do have several concerns about the effect that a larger number of pupils will have on the school:

- The ability to continue to provide such a creative and challenging curriculum.
- The feasibility of providing hot lunches to all pupils who require one, in the time frame and space available.
- The increase in traffic and all the challenges of illegal parking and general child safety that this issue illicit.

Whitmore High School

The Headteacher of Whitmore High School responded to the consultation by email: “Thank you for the letter of the 8th January from Johanna Morgan in regard to the Consultation about the Permanent Expansion of Longfield Primary School.

Whitmore's response is that we support the expansion and Longfield provides excellent education for local students.”

Two emails were received from residents in the generic email account [SchoolReorganisation@harrow.gov.uk](mailto:SchoolReorganisation@harrow.gov.uk) about the proposed expansion.

- Resident in Hawthorn Drive which is the main road next to the school. “I really am not happy with this expansion of Longfield Primary School for the following reason. We are already plagued with non-resident parkers and that any expansion would have to be accompanied by the implementation of parking restrictions in the roads surrounding Longfield.” The author was encouraged to respond to the consultation via the Harrow Council website so all the consultation responses could be collated together.
- There was an email exchange with a resident who described traffic problems and disrespectful behaviour in the nearby streets and asked for assurances that the revised School Travel Plan will actually work. Full officer responses were given to the resident in line with the ‘Officer response to the consultation comments’

and the School Travel Plans are submitted as part of the planning applications.

- There is a communication strategy for the expansion projects which includes raising the profile of school travel planning. Additional Communications officer time is commissioned to give communication and engagement work a high profile.
- Parking enforcement officers visit the areas of all schools in Harrow and issue tickets when applicable. Two automatic number plate recognition CCTV cars have been introduced to reinforce enforcement work. They are dedicated to schools exclusively.



		<p>section below.</p> <p><b>Consultation comments</b></p> <p>Opportunity was given for comments to be added after each question if the respondent wished to do so. The four main themes in consultation comments and responses relate to:</p> <ul style="list-style-type: none"> <li>• <u>Alternative approaches to creating additional school places in Harrow.</u> For example: build schools away from densely populated residential areas; the approach does not address underlying problems of unsustainable immigration and over-crowding; build new schools; expanding schools is not the solution.</li> <li>• <u>Impact on educational standards.</u> For example: disruption to the school for the next few years; resources and staff are too stretched currently; reduced activities because of the number of children; focus will be taken away from making the school outstanding.</li> <li>• <u>Impact on residents in adjoining properties.</u> For example: will involve buildings that either overlook local residents' homes to replace green space; will create more noise in the garden.</li> <li>• <u>Traffic and congestion issues.</u> For example: traffic congestion; parking problems; blocking of driveways; parents stopping to drop off children on zig zag lines; rude behaviour by parents.</li> </ul> <p><b>Officer response to the consultation comments</b></p> <p><u>Alternative approaches to creating additional school places in Harrow</u></p> <p>Harrow has developed its spatial planning for sustainable development to meet the needs for additional housing and infrastructure in the borough. This takes account of space for additional schools, and new schools are being created wherever this is possible.</p> <p>Harrow has a statutory responsibility to ensure there are sufficient school places for children in its area. Schools are being expanded across Harrow to provide the additional school places close to where the children live. This approach reduces the need for cars to be used to take children to and from school and reduces car use across the borough.</p> <p>Harrow Council has developed its strategic approach to the creation of additional school places. This approach has received consistent levels of approval in consultations, including in this consultation.</p> <p><u>Impact on educational standards</u></p> <p>A key principle for the Council and schools in the expansion proposals is the maintenance of high quality education standards. All schools, with council support as necessary, will work to ensure high education standards are promoted through the</p>	
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expansions. The Governing Body response recognises the importance of maintaining high educational standards, and the governing body and senior leadership team of the school would ensure appropriate structures are in place to manage the increased numbers of pupils and to deliver a creative and challenging curriculum. The challenge of providing hot lunches to all pupils who require one has already been discussed with architects in the site scoping stage and would be considered further in the design feasibility work.

Any disruption to the education of pupils during the build programme would be kept to an absolute minimum. A considerate and experienced contractor would be procured for the build programme. A Project Manager would be appointed from the Council's Children's Capital Team to ensure full and effective liaison with the school during the build programme.

Impact on residents in adjoining properties

The points of concern would be considered in design feasibility work. Planning requirements in relation to these issues would be complied with. There would be early discussion with Planning officers about design proposals so that any potential issues would be identified and addressed early in the process. If the expansion of the school is approved, pre-Planning engagement would occur around Easter 2015 when design proposals would be available for comments that could be incorporated into refining the design proposal. There would be statutory consultation following a planning application being submitted for any further comments and any concerns to be considered.

Though Planning is a subsequent and separate statutory process, extensive efforts were made during the consultation phase to bring the expansion proposal to the attention of local residents. This is to bring early awareness to residents of the possibility of new build, in recognition that such concerns may arise and in recognition of concerns about traffic congestion around schools at school drop off and collection times.

Traffic and congestion issues

The concerns expressed about traffic congestion, parking and road safety in the area are fully recognised and are the consistent major theme arising from the expansion consultations. A cross-council approach is being implemented to minimise the impact of the additional pupils attending the schools proposed for expansion. This approach brings officers together from Children and Families, Enterprise and Environment and Communications to co-ordinate work.

This proposal would require a building programme, for which planning permission would be needed. An independent Transport Assessment and the Longfield Primary

School Travel Plan would be submitted as part of the planning application. If an application is submitted, a decision on this will be a matter for the Planning Committee. This committee will consider highways and traffic concerns and the impact of the development on the local area. Residents and parents who believe they are impacted by this decision are entitled to make representations to the planning committee during the statutory planning consent timescales.

6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?

List the Title of reports / documents and websites here.

The GLA School Roll Projections Service draws on a range of available national and regional data to inform its projections.  
A regional approach is an important aspect of meeting the needs of children and young people with special educational needs. Discussions are held with free school proposers, and with neighbouring local authorities through the West London Alliance, to inform work to meet the need.

**Stage 3: Assessing Potential Disproportionate Impact**

7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No	✓	✓	✓	✓	✓	✓	✓	✓	✓

**YES** - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

- **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

**NO** - If you have ticked 'No' to all of the above, then go to **Stage 6**

- Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

**Stage 4: Collating Additional data / Evidence**

8. What additional data / evidence have you considered in

Note: Please go to Stage 6.

relation to your proposals as a result of the analysis at Stage 3? (include this evidence, including any data, statistics, titles of documents and website links here)	
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**9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?**

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
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Note: Please go to Stage 6.			
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**Stage 5: Assessing Impact and Analysis**

**10. What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?**

Protected Characteristic	Adverse ✓	Positive ✓	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.  <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</b>	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older people)			Note: Please go to Stage 6.	
Disability (including				

carers of disabled people)				
Gender Reassignment				
Marriage and Civil Partnership				
Pregnancy and Maternity				
Race				
Religion or Belief				
Sex				
Sexual orientation				

<b>11. Cumulative Impact</b> – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?  If yes, which Protected Characteristics could be affected and what is the potential impact?	Yes		No	
	Note: Please go to Stage 6.			

<b>11a. Any Other Impact</b> – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?  If yes, what is the potential impact and how likely is to happen?	Yes		No	
	Note: Please go to Stage 6.			

**12.** Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? (Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on [Harrow HUB/Equalities and Diversity/Policies and Legislation](#)

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No									

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

- If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. **(select outcome 4)**
- If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. **(select outcome 4)**

**Stage 6: Decision**

**13.** Please indicate which of the following statements best describes the outcome of your EqIA ( ✓ tick one box only)

<b>Outcome 1</b> – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.	✓
<b>Outcome 2</b> – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i>	
<b>Outcome 3</b> – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. <b>(Explain this in 13a below)</b>	
<b>Outcome 4</b> – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	
<b>13a.</b> If your EqIA is assessed as <b>outcome 3 or you have ticked 'yes' in Q12</b> , explain your justification with full reasoning to continue with your proposals.	

### Stage 7: Improvement Action Plan

**14.** List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
Age. Insufficient school places for children in Harrow.	Work has been undertaken to maximise funding from the Government to create additional school places. This has included applications to the Priority School Building Programme and the Targeted Basic Need Programme, as well as work to maximise the annual basic need allocations.	Delivery, affordability and value for money will be monitored by the corporate Programme Board. Key milestones will be reported with RAG ratings to monitor progress.	1 September 2015.	Chris Spencer, Corporate Director Children & Families, through the Programme Board.	1 September 2013

<p>Disability. Mobility access.</p>	<p>Access issues will be considered throughout the design and construction processes. Longfield Primary School has existing accessibility issues that have been discussed with the Architect and the Head of the Capital Project Team during site scoping work and provision for a lift has been included in site scoping design options for consideration as to whether any access issues could be addressed as part of the building works if the expansion proceeds.</p>	<p>As far as possible, the approach is to build towards an accessible school. It may be possible to address any access issues as part of the building works if the expansion proceeds.</p>	<p>1 September 2015.</p>	<p>Russell Eacott, Head of Capital Project Team</p>	<p>18 February 2014 (access issues raised at weekly update meeting)</p>
<p>Insufficient education provision to meet the needs of children with special educational needs.</p>	<p>This area of potential adverse impact of the increased number of children in the borough has been considered. Harrow Cabinet agreed its Special School and SEN Placements Planning Framework in July 2013 and, following successful applications to the Government's Targeted Basic Need Programme, new places are being created at special schools and through new additionally resourced provision places in Harrow's mainstream schools from September 2015.</p>	<p>Completion of the projects to expand Harrow's special schools and to create units for more additionally resourced provision places in Harrow's mainstream schools.</p>	<p>1 September 2015.</p>	<p>Chris Spencer, Corporate Director Children &amp; Families, through the Programme Board.</p>	<p>1 March 2013</p>
<p>Residents / Service Users. Many concerns about the impacts of traffic congestion.</p>	<p>Measures are being put in place to address the traffic and congestion issues arising from the creation of additional school places. See Stage 2 Section 5 above.</p>	<p>Traffic Assessment and School Travel Plan will be submitted as part of the Planning Application.</p>	<p>June 2015.</p>	<p>Russell Eacott, Head of Capital Project Team.</p>	<p>November 2013.</p>



## Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

<p><b>15.</b> How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>The School Organisation Officer Group, comprised of representatives from relevant corporate departments, meets monthly and will monitor the impact of proposals and the continuing levels of need.</p>
<p><b>16.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>Regular reports are presented to Cabinet on school organisation matters, including quarterly update reports on the school expansion programme. These reports are published on the Harrow Council website.</p> <p>The School Expansion Stakeholder Reference Group has been established and meets monthly. The School Expansion Stakeholder Reference Group is a cross party representative group to provide advice and guidance on the implementation of the school expansion programme. The meetings are minuted.</p> <p>The Programme Board of senior corporate officers and the constructor meets regularly to monitor the construction programme to ensure appropriate accommodation is provided at the schools for the additional pupils.</p>
<p><b>17.</b> Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p>	<p>A range of views and comments were received in support and opposed to the expansion proposal (see section 5 in Stage 2 above).</p> <p>The responses made to the first consultation question indicate agreement (58%) with the Council's approach to creating additional school places in Harrow with only 30% of respondents disagreeing with the approach.</p> <p>Just under half (46%) of the respondents to the second consultation question disagree with the Council's proposal to expand Longfield Primary School. Half the parent/carer respondents (3 out of 6) disagree with the expansion of the school. Resident responses were even (6 agree and 6 disagree with the expansion of the school).</p>

The low response level of 24 needs to be viewed in the context of some hundreds of response forms distributed to parents and staff by the school and 570 letters delivered by the Council to local residents. Also the publicising of the online consultation response portal on the Harrow Council website.

### Stage 9: Public Sector Equality Duty

**18.** How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.

(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups
By acting to ensure all children in Harrow have access to a high quality school place, Harrow is promoting equality of opportunity for all children and young people.	By acting to ensure all children in Harrow have access to a high quality school place, Harrow is promoting equality of opportunity for all children and young people.	By acting to ensure all children in Harrow have access to a high quality school place, Harrow is promoting equality of opportunity for all children and young people.

### Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

**The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.**

<b>19.</b> Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	The corporate Equality Impact Assessment Quality Assurance Group.		
Signed: (Lead officer completing EqIA)	<i>Chris Melly</i>	Signed: (Chair of DETG)	<i>Roger Rickman</i>
Date:	20 <sup>th</sup> February 2015	Date:	2 <sup>nd</sup> March 2015
Date EqIA presented at the EqIA Quality Assurance Group	2 <sup>nd</sup> March 2015	Signature of ETG Chair	<i>Mohammed Ilyas</i>

October 2014 School Census	Longfield Primary School
<b>AGE as at 31st August 2014</b>	
3	7%
4	12%
5	16%
6	3%
7	12%
8	16%
9	12%
10	13%
<b>Grand Total</b>	<b>743</b>
<b>GENDER</b>	
Female	49%
Male	51%
<b>Grand Total</b>	<b>743</b>
<b>ETHNICITY</b>	
Bangladeshi	1.08%
Indian	22.75%
Asian Other	28.67%
Pakistani	7.27%
Black African	1.75%
Black Caribbean	1.88%
Black Other	0.67%
Mixed Other	2.02%
Chinese	0.40%
Mixed White/Asian	1.48%
Mixed White/Black African	0.00%
Mixed White/Black Caribbean	0.81%
Not Obtained	0.27%
White British	7.94%
Any Other Ethnic Group	2.96%
White Irish Traveller	0.00%
White Irish	0.00%
White Other	4.04%
Unknown	15.61%
<b>Grand Total</b>	<b>743</b>
<b>SEN</b>	
No SEN – N	87%
School Action – A	8.1%
School Action Plus – P	2.4%
SEN Support -K	0.8%
Statement of SEN – S	2.0%
<b>Grand Total</b>	<b>743</b>

Source: Collect export: all schools Blade-Export\_06-11-2014\_pupilonroll.xls

**Monitoring information**

When completing their responses to the consultation, respondents were invited to provide information about how they perceive their social identity to assist with monitoring the effectiveness of the consultation outreach. Anonymous information was requested under the following categories: disability; ethnic group; and religion. The following tables show the responses received under these categories.

**Respondents by Disability**

	<b>Number</b>	<b>Percentage</b>
Not Disabled	18	75%
Disabled	2	8.33%
Not Stated	4	16.67%

**Respondents by Ethnic Group**

<b>Ethnic Group</b>	<b>Number</b>	<b>% of total response</b>
Asian Or Asian British	4	16.67%
Black or Black British	0	0%
Other Ethnic Group	0	0%
Mixed ethnic background	0	0%
White	13	54.17%
Did Not Specify	7	29.17%

**Respondents by Religion**

	<b>Number</b>	<b>Percentage</b>
Buddhism	0	0%
Christianity	11	45.83%
Hinduism	2	8.33%
Islam	0	0%
Jainism	1	4.17%
Judaism	0	0%
Sikh	0	0%
Zoroastrian	0	0%
Other	1	4.17%
No Religion	2	8.33%
Not Stated	7	29.17%

Population - All usual residents

Units - Persons

Date - 2011

**Main Wards for the North West Primary Planning Area**

(Over 40% of pupils in these Wards attend schools in the planning area)

Ethnic Group	Harrow Weald		Hatch End		Headstone North		Pinner		Pinner South	
	number	%	number	%	number	%	number	%	number	%
<b>All usual residents</b>	<b>11,376</b>	<b>100.0</b>	<b>10,693</b>	<b>100.0</b>	<b>10,093</b>	<b>100.0</b>	<b>10,026</b>	<b>100.0</b>	<b>10,411</b>	<b>100.0</b>
<b>White: English/Welsh/Scottish/Northern Irish/British</b>	4,633	40.7	5,114	47.8	3,949	39.1	5,192	51.8	5,370	51.6
<b>White: Irish</b>	608	5.3	271	2.5	302	3.0	320	3.2	265	2.5
<b>White: Gypsy or Irish Traveller</b>	2	0.0	3	0.0	1	0.0	4	0.0	5	0.0
<b>White: Other White</b>	637	5.6	670	6.3	530	5.3	697	7.0	549	5.3
<b>Mixed/multiple ethnic groups: White and Black Caribbean</b>	170	1.5	78	0.7	75	0.7	82	0.8	83	0.8
<b>Mixed/multiple ethnic groups: White and Black African</b>	50	0.4	30	0.3	26	0.3	45	0.4	31	0.3
<b>Mixed/multiple ethnic groups: White and Asian</b>	173	1.5	143	1.3	177	1.8	153	1.5	167	1.6
<b>Mixed/multiple ethnic groups: Other Mixed</b>	123	1.1	141	1.3	101	1.0	96	1.0	104	1.0
<b>Asian/Asian British: Indian</b>	2,120	18.6	2,580	24.1	2,684	26.6	1,739	17.3	1,975	19.0
<b>Asian/Asian British: Pakistani</b>	290	2.5	222	2.1	346	3.4	279	2.8	262	2.5
<b>Asian/Asian British: Bangladeshi</b>	79	0.7	28	0.3	34	0.3	52	0.5	46	0.4
<b>Asian/Asian British: Chinese</b>	84	0.7	71	0.7	136	1.3	98	1.0	132	1.3
<b>Asian/Asian British: Other Asian</b>	975	8.6	638	6.0	969	9.6	582	5.8	977	9.4
<b>Black/African/Caribbean/Black British: African</b>	476	4.2	229	2.1	196	1.9	256	2.6	154	1.5
<b>Black/African/Caribbean/Black British: Caribbean</b>	342	3.0	157	1.5	234	2.3	136	1.4	81	0.8
<b>Black/African/Caribbean/Black British: Other Black</b>	236	2.1	93	0.9	110	1.1	108	1.1	77	0.7
<b>Other ethnic group: Arab</b>	197	1.7	106	1.0	85	0.8	87	0.9	43	0.4
<b>Other ethnic group: Any other ethnic group</b>	181	1.6	119	1.1	138	1.4	100	1.0	90	0.9
<b>Main Ethnic Groups</b>										
White	5,880	51.7	6,058	56.7	4,782	47.4	6,213	62.0	6,189	59.4
Mixed/multiple ethnic groups	516	4.5	392	3.7	379	3.8	376	3.8	385	3.7
Asian/Asian British	3,548	31.2	3,539	33.1	4,169	41.3	2,750	27.4	3,392	32.6
Black/African/Caribbean/Black British	1,054	9.3	479	4.5	540	5.4	500	5.0	312	3.0
Other ethnic group	378	3.3	225	2.1	223	2.2	187	1.9	133	1.3

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.